

Serial No. 09/981,453
Response to office action mailed December 14, 2006

Filed On: October 18, 2001

Remarks

Claims 21-22, 24-30, 32-33, 41-77, and 79 are pending in the present patent application. Claims 21-22, 24-30, 41-42, 46-47, 58, 60, 64, 67, 71-72, 75, and 79 have been amended to clarify that which was already claimed, and/or to maintain antecedent basis. Claims 23, 31, and 78 have been canceled. Reconsideration of the pending Claims and allowance is respectfully requested in view of the amendments to the Claims and the following comments.

The 35 U.S.C. 103(a) Claim Rejections

In the office action mailed December 14, 2006, Claims 21-33 and 41-79 stand rejected pursuant to 35 U.S.C. 103(a) as being obvious in view of the combination of U.S. Patent No. 6,635,089 to Burkett et al. (hereinafter "Burkett") and U.S. Patent No. 6,658,625 to Allen (hereinafter "Allen"). Applicant respectfully traverses the rejections of Claims 21-25 and 27-33 because the combination of Burkett and Allen fail to teach, suggest or disclose each and every limitation of the claims and thus a *prima facie* case of obviousness in view of the cited prior art cannot be maintained.

Claims 21-22, 24-30, 32-33, and 71-75

Amended Claim 21 describes a method that includes the step of, during the translation, limiting the data structure of the first document object model document to representation as an input message with a plurality of fields. Units of data included in each of the fields is limited to a data type that is pre-specified in the business services application. Amended Claim 21 also describes the step of, while the data is read in, limiting the data structure of the second document object model document to representation as an output message with a plurality of fields. Units of data included in each of the fields is limited to a data type that is pre-specified in the business services application.

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Burkett, on the other hand, describes a method of dynamically retrieving data from a database or a file store, or periodically refreshing the results of a database query. (Col. 7 lines 49-59) Burkett describes processing an XML document that is adapted for dynamic content retrieval and update using a corresponding DOM tree. (Col. 9 lines 44-46 and 55-60) In the office action, it was asserted that Burkett describes in FIG. 10 and Col. 16 line 60-Col. 17 line 24 limiting the data structure of a document object model (DOM) document during translation of a request to the DOM document as described in amended Claim 21. To the contrary, Burkett describes processing an INCLUDE node in a DOM tree that indicates a file access is to be performed (Col. 13 line 10) and a REFRESH-WHEN node to refresh data in the DOM tree upon occurrence of a condition (Col. 13 lines 47-49).

Clearly, the processing and updating of the INCLUDE and REFRESH-WHEN nodes described by Burkett are performed in a DOM tree that was previously translated. In fact, Burkett teaches away by describing that an XML document is parsed to form a DOM tree without any concern for limiting the data structure since Burkett is concerned solely with dynamic updating of a DOM tree from external sources. (Col. 16 lines 13-16, Col. 11 lines 55-58, Col. 8 lines 55-57) This is in sharp contrast to amended Claim 21 that describes during the translation of a request to a DOM document limiting the data structure of the DOM document.

In addition, Burkett teaches away from limiting the data structure of a DOM document as described in Claim 21 since Burkett teaches that additional data is imported into the DOM tree in the form of a document to increase the data structure when the DOM tree is re-parsed. (Col. 16 lines 21-23, Col. 17 lines 15-18) Further, Burkett describes that XML notation allows specification of virtually any type of structured information from which a DOM tree is constructed based on syntax and relationships of tags embedded in the XML notation. (Col. 8 lines 8-10, Col. 2 lines 44-49) Since limiting the data structure is not described, it follows that

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Burkett cannot possibly describe limiting the data structure of a DOM document to an input message with a plurality of fields, wherein units of data included in each of the fields is limited to a data type that is pre-specified in a business services application as described in Claim 21. To the contrary, both Burkett and Allen are silent on how units of data are specified and/or do not describe a datatype pre-specified in a business services application as recited in Claim 21.

Thus, the combination of Burkett and Allen fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. (see MPEP 2143) Since all of the claim limitations described by amended Claim 21 and the claims depending therefrom are not taught or suggested, a *prima facie* case of obviousness cannot be maintained. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 22, 24-30, 32-33 and 71-75.

Claims 41-50, 76-77, and 79

Claim 41 has been amended to describe a MESSAGEDEFINITION class operable in the server, wherein the MESSAGEDEFINITION class includes a listing of pre-specified fields each of which describe a corresponding pre-specified data type, and wherein the Message class and the Field class are further operable within the server during translation to limit a format of corresponding fields included in the input message to a predetermined data structure based on the described corresponding pre-specified data type; and a BusinessService class operable within the server computer to direct the execution of custom application code as a function of the input message, wherein the custom application code includes a pre-specified data type to limit the format of those fields included in the input message that do not correspond to the listing of pre-specified fields.

In contrast, neither Burkett or Allen alone or in combination teach or suggest a MESSAGEDEFINITION class that includes a listing of pre-specified fields each of which describe a corresponding pre-specified data type, and custom application code that includes a pre-

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specified data type to limit the format of those fields included in an input message that do not correspond to the listing of pre-specified fields.

Accordingly, the combination of Burkett and Allen fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. Since all of the claim limitations described by Claim 41 and the claims depending therefrom are not taught or suggested, a *prima facie* case of obviousness cannot be maintained. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 41-50, 76-77 and 79.

Claims 51-63

Unamended Claim 51 describes the steps of converting a request to a plurality of fields based on request parameters included in the request, limiting a datatype of data included in the fields to a predefined group of datatypes, and extracting the request parameters based on the datatype. Burkett, on the other hand, describes a method of dynamically updating a DOM tree. In the office action mailed December 14, 2006, it has been asserted that limiting a datatype of data included in the fields to a predefined group of datatypes is described by Burkett in FIG. 10 and Col., 16 line 60 – Col. 17 line 24).

However, as previously discussed, Burkett is clearly not describing limiting a datatype of data, but rather is describing dynamic updating of data in a DOM tree by loading and parsing a document referenced in the DOM tree and replacing the reference with the loaded and parsed document. (Col. 17 lines 15-17) Thus, Burkett does not describe a pre-defined group of data types nor limiting a data type of data included in fields based on such a group as described in Claim 51. To the contrary, Burkett teaches that whatever is in a referenced document is simply parsed and loaded into a DOM tree without regard to the data types of data included in the document. Burkett's only concern is to simply check for errors in the data. Clearly errors are not

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limiting a data type to a predefined group of data types as described in Claim 51. Since Burkett does not describe limiting a data type, Burkett also cannot describe extracting request parameters based on the datatype as further described in Claim 51. Allen also does not describe such steps.

Thus, the combination of Burkett and Allen fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. (see MPEP 2143) Since all of the claim limitations described by Claim 51 and the claims depending therefrom are not taught or suggested, a *prima facie* case of obviousness has not been established. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 51-63.

Claims 64-70

Amended Claim 64 is directed to an e-commerce architecture that includes a server computer operable to execute instructions to restrict the conversion to a first document object model document based on a listing of data types that are pre-specified for request parameters extracted from a request, wherein the data types limit the data structure of a plurality of fields included in the first document object model document to a predetermined data structure specified by the data types.

Burkett, on the other hand, does not describe a listing of data types nor that the data types limit the data structure of fields included in a DOM document as described in Claim 1. To the contrary, Burkett describes a DOM tree that can provide unlimited data structures based on dynamic collection of data as previously discussed. Thus, Burkett teaches away from the operability of the server computer described in Claim 64, and Allen also fails to describe data types that limit a data structure as described in Claim 64.

Accordingly, the combination of Burkett and Allen fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. Since all of the claim limitations described

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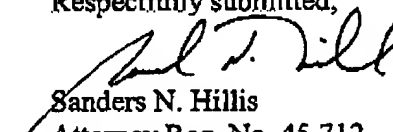
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by amended Claim 64 and the claims depending therefrom are not taught or suggested, a *prima facie* case of obviousness cannot be maintained. Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 64-70.

Conclusion

In view of the amendments to the Claims and the above discussion, the application is believed to now be in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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